

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ANTHONY SANDERS and
OLIVIA SANDERS, h/w

CIVIL ACTION

v.

RYDER TRUCK RENTAL, INC. a/k/a and : NO.
d/b/a RYDER TRUCK RENTAL, RYDER :
SYSTEM, INC. and JULIO ACEVEDO :

NOTICE OF REMOVAL

TO: The United States District Court
for the Eastern District of Pennsylvania

Defendants, Ryder Truck Rental, Inc. (incorrectly identified as "Ryder Truck Rental, Inc. a/k/a and d/b/a Ryder Truck Rental"), Ryder System, Inc. and Julio Acevedo, by and through their attorneys, Yost & Tretta, LLP, hereby file the within Notice of Removal of the above-captioned matter from the Philadelphia County Court of Common Pleas in which it is now pending, to the United States District Court for the Eastern District of Pennsylvania, and in support thereof, aver as follows:

1. This action was commenced by Writ of Summons filed in the Philadelphia County Court of Common Pleas, February Term, 2017, No. No. 07409.

2. Plaintiff's Complaint was filed and served on counsel on or about September 19, 2017.

FILED
SEP 29 2017
By KATE BARKMAN, Clerk
Dep. Clerk

3. At all times relevant to this action, plaintiff, Anthony Sanders, was an adult individual and citizen of the Commonwealth of Pennsylvania, residing at 5321 Baltimore Avenue, Philadelphia PA.

4. At all times relevant to this action, plaintiff, Olivia Sanders, was an adult individual and citizen of the Commonwealth of Pennsylvania, residing at 5321 Baltimore Avenue, Philadelphia PA.

5. At all times relevant to this action, defendant, Ryder Truck Rental, Inc., was a Florida corporation with its principal place of business located at 11690 NW 105th Street, Miami, FL 33178.

6. At all times relevant to this action, defendant, Ryder System, Inc., was a Florida corporation with its principal place of business located at 11690 NW 105th Street, Miami, FL 33178.

7. Plaintiff served the Writ of Summons upon a local Ryder leasing location at 1450 South Warfield Street in Philadelphia, however, both Ryder Truck Rental, Inc. and Ryder System, Inc. are incorporated under the laws of the State of Florida and have principal places of businesses at the above Miami address.

8. At all times relevant to this action, defendant, Julio Acedevo, was an adult individual and a citizen of the state of New Jersey, residing at 406 Lawrie Street, Perth Amboy, NJ 08861.

9. Thus, complete diversity of citizenship exists among the parties.

10. The value of the matter in controversy, as appearing from the allegations contained in the Complaint, exceeds the amount of \$75,000.00, exclusive of interest and costs.

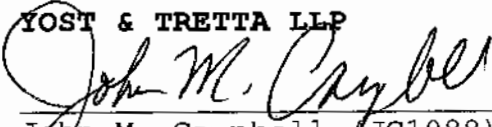
11. Accordingly, because diversity of citizenship exists and the amount in controversy exceeds \$75,000.00 exclusive of interest and costs, original jurisdiction exists in the United States District Court for the Eastern District of Pennsylvania pursuant to 28 U.S.C. Sec. 1332.

12. Copies of all process, pleadings and Orders which have been received by the defendants are attached hereto as Exhibit "A."

13. This Notice is timely, having been filed within thirty (30) days of filing and service of the Complaint.

WHEREFORE, notice is given that this action is removed from the Philadelphia County Court of Common Pleas to the United States District Court for the Eastern District of Pennsylvania.

Respectfully submitted,

YOST & TRETTE LLP
BY: 
John M. Campbell (JC1088)
Michael F. Kernoschak (MFK1485)
Attorneys for Defendants, Ryder
Truck Rental, Inc. (incorrectly
identified as "Ryder Truck
Rental, Inc. a/k/a and d/b/a
Ryder Truck Rental"), Ryder
System, Inc. and Julio Acevedo
Two Penn Center Plaza, Suite 610
1500 John F. Kennedy Boulevard
Philadelphia, PA 19102
(215) 972-6600

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ANTHONY SANDERS and
OLIVIA SANDERS, h/w

v.

RYDER TRUCK RENTAL, INC. a/k/a and : NO.
d/b/a RYDER TRUCK RENTAL, RYDER :
SYSTEM, INC. and JULIO ACEVEDO :

CIVIL ACTION

FILED
SEP 29 2017
KATE BARKMAN, Clerk
By _____ Dep. Clerk

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the within Notice of Removal was served upon counsel via First Class Mail on September 28, 2017:

Saul M. Bentley, Esquire
The Saul Law Building
1313 Race Street
Philadelphia, PA 19107

YOST & TRETTE LLP

BY: 

John M. Campbell (JC1088)
Michael F. Kernoschak (MFK1485)
Attorneys for Defendants, Ryder
Truck Rental, Inc. (incorrectly
identified as "Ryder Truck
Rental, Inc. a/k/a and d/b/a
Ryder Truck Rental"), Ryder
System, Inc. and Julio Acevedo
Two Penn Center Plaza, Suite 610
1500 John F. Kennedy Boulevard
Philadelphia, PA 19102
(215) 972-6600

EXHIBIT “A”

Court of Common Pleas of Philadelphia County
Trial Division
Civil Cover Sheet

For Prothonotary Use Only (Docket Number)

FEBRUARY 2017**007409**

Filing Number: 1702068817

PLAINTIFF'S NAME ANTHONY SANDERS		DEFENDANT'S NAME RYDER TRUCK RENTAL, INC., ALIAS: RYDER TRUCK RENTAL	
PLAINTIFF'S ADDRESS 5321 BALTIMORE AVENUE PHILADELPHIA PA 19143		DEFENDANT'S ADDRESS 1450 SOUTH WARFIELD STREET PHILADELPHIA PA 19146	
PLAINTIFF'S NAME OLIVIA SANDERS		DEFENDANT'S NAME RYDER SYSTEMS, INC.	
PLAINTIFF'S ADDRESS 5321 BALTIMORE AVENUE PHILADELPHIA PA 19143		DEFENDANT'S ADDRESS 11690 NW 105TH STREET MIAMI FL 33178	
PLAINTIFF'S NAME		DEFENDANT'S NAME JULIO ACEVEDO	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS 406 LAWRIE STREET PERTH AMBOY NJ 08861	
TOTAL NUMBER OF PLAINTIFFS 2	TOTAL NUMBER OF DEFENDANTS 3	COMMENCEMENT OF ACTION <input type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input checked="" type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input checked="" type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Other:		
CASE TYPE AND CODE 2V - MOTOR VEHICLE ACCIDENT			
STATUTORY BASIS FOR CAUSE OF ACTION			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)		IS CASE SUBJECT TO COORDINATION ORDER? YES NO	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>ANTHONY SANDERS , OLIVIA SANDERS</u> Papers may be served at the address set forth below.		FILED PRO PROTHY FEB 28 2017 M. BRYANT	
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY BENTLEY M. SAUL		ADDRESS THE SAUL LAW BUILDING 1313 RACE STREET PHILADELPHIA PA 19107	
PHONE NUMBER (215) 496-1100	FAX NUMBER (215) 496-0464		
SUPREME COURT IDENTIFICATION NO. 68832		E-MAIL ADDRESS bsaul@saullaw.com	
SIGNATURE OF FILING ATTORNEY OR PARTY BENTLEY SAUL		DATE SUBMITTED Tuesday, February 28, 2017, 03:40 pm	

FINAL COPY (Approved by the Prothonotary Clerk)

THIS IS A NON-JURY MATTER.
ASSESSMENT OF DAMAGES REQUIRED



BENTLEY M. SAUL, LTD.
By: Bentley M. Saul, Esquire
Identification No.: 68832
The Saul Law Building
1313 Race Street
Philadelphia, Pennsylvania 19107
(215) 496-1100

Attorney for Plaintiffs

ANTHONY SANDERS and :
OLIVIA SANDERS, h/w :
5321 Baltimore Avenue :
Philadelphia, Pennsylvania 19143 :
v. :
RYDER TRUCK RENTAL, INC a/k/a and :
d/b/a RYDER TRUCK RENTAL :
1450 South Warfield Street :
Philadelphia, Pennsylvania 19146 :
and :
RYDER SYSTEM, INC. :
11690 NW 105TH Street :
Miami, Florida 33178 :
and :
JULIO ACEVEDO :
406 Lawrie Street :
Perth Amboy, New Jersey 08861 :

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

FEBRUARY TERM, 2017

NO.:

PRAECIPE TO ISSUE SUMMONS

TO THE PROTHONOTARY:

Kindly issue the Summons in the above-captioned matter.

BENTLEY M. SAUL, LTD.

BY: /s/
Bentley M. Saul, Esquire
Attorney for Plaintiff

Date: February 28, 2017

CP 37

Commonwealth of Pennsylvania
CITY AND COUNTY OF PHILADELPHIA

SUMMONS
CITACION

ANTHONY SANDERS and OLIVIA
SANDERS, h/w
5321 Baltimore Avenue
Philadelphia, Pennsylvania 19143

COURT OF COMMON PLEAS

February Term, 20¹⁷

No. _____

vs.

RYDER TRUCK RENTAL, INC. a/k/a and
d/b/a RYDER TRUCK RENTAL, et al.

To⁽¹⁾

RYDER TRUCK RENTAL, INC a/k/a
and
d/b/a RYDER TRUCK RENTAL
1450 South Warfield Street
Philadelphia, Pennsylvania 19146

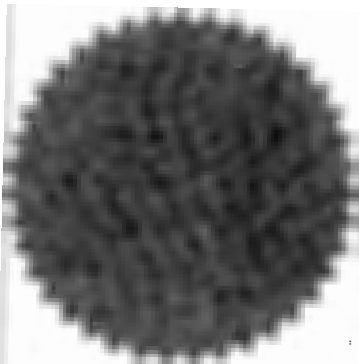
RYDER SYSTEM, INC.
11690 NW 105TH Street
Miami, Florida 33178

JULIO ACEVEDO
406 Lawrie Street
Perth Amboy, New Jersey 08861

You are notified that the Plaintiff⁽²⁾
Usted esta avisado que el demandante⁽²⁾

ANTHONY SANDERS and OLIVIA SANDERS

Has (have) commenced an action against you.
Ha (han) iniciado una accion en contra suya.



⁽¹⁾ Name(s) of Defendant(s)

⁽²⁾ Name(s) of Plaintiff(s)

10-208 (Rev 6/00)

JOSEPH H. EVERS
Prothonotary

By _____
Date FEBRUARY 28, 2017



Case ID: 170207409

COURT OF COMMON PLEAS

February Term, 20 17 No.

ANTHONY SANDERS and OLIVIA SANDERS,
h/w
5321 Baltimore Avenue
Philadelphia, Pennsylvania 19143

vs.

RYDER TRUCK RENTAL, INC. a/k/a and d/b/a
RYDER TRUCK RENTAL, et al.

SUMMONS

Affidavit / Return of Service

Plaintiff:	OLIVIA SANDERS ANTHONY SANDERS				Court Term & No.: 170207409 E-File# 1703021643	
Defendant:	RYDER TRUCK RENTAL, INC.				Document Served: Plaintiff's Writ of Summons	
Serve at:	1450 SOUTH WARFIELD STREET				Company Reference/Control No.: 139151	
<p>Served and Made Known to RYDER TRUCK RENTAL, INC. on 03/04/2017 at 10:50 AM, in the manner described below:</p> <p>Agent or person in charge of Party's office or usual place of business. NAME: DENNIS WAY</p>						
Description	Age:	Height:	Weight:	Race:	Sex:	
	44	5' 9"	180 lbs.	Caucasian	Male	
	Other:					
Company Profile: DENNIS RICHMAN SERVICES FOR THE PROFESSIONAL, INC. 1500 J.F.K. BOULEVARD SUITE 1706 PHILADELPHIA PA 19102 PHONE: (215) 977-9393				Name of Server: JACOB T. BOOTH Being duly sworn according to law, deposes and says that he/she is process server herein names; and that the facts herein set forth above are true and correct to the best of their knowledge, information and belief.		
				Deputy Sheriff:		

FILED AND ATTESTED PRO-PROTHY 08 MAR 2017 08:32 PM

BENTLEY M. SAUL, LTD.

By: Bentley M. Saul, Esquire
Identification No.: 68832
The Saul Law Building
1313 Race Street
Philadelphia, Pennsylvania 19107
(215) 496-1100



Attorney for Plaintiff

ANTHONY SANDERS and :
OLIVIA SANDERS, h/w :
v. :
RYDER TRUCK RENTAL, INC a/k/a and :
d/b/a RYDER TRUCK RENTAL :
and :
RYDER SYSTEM, INC. :
and :
JULIO ACEVEDO :

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

FEBRUARY TERM, 2017
NO.: 7409

AFFIDAVIT OF COMPLETED SERVICE

I do hereby certify that I have complied with the July 31, 2017 Order of this Court, a copy of which is attached hereto. A copy of Plaintiff's Writ of Summons was served on Defendant Julio Acevedo, 406 Lawrie Street, Perth Amboy, New Jersey 08861 by Certified Mail Return Receipt Requested and Regular United States Mail on July 31, 2017.

By: /s/
Bentley M. Saul, Esquire
Attorney for Plaintiff

Date: August 4, 2017

FILED

21 JUL 2017 12:55 pm

Civil Administration

**IN THE COURT OF COMMON PLEAS OF PHILADELPHIA
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
CIVIL TRIAL DIVISION**

ANTHONY SANDERS and	:	
OLIVIA SANDERS, h/w	:	COURT OF COMMON PLEAS
v.	:	PHILADELPHIA COUNTY
RYDER TRUCK RENTAL, INC a/k/a and	:	
d/b/a RYDER TRUCK RENTAL	:	FEBRUARY TERM, 2017
and	:	NO.: 7409
RYDER SYSTEM, INC.	:	
and	:	
JULIO ACEVEDO	:	

ORDER

AND NOW, this 21st day of July, 2017 upon consideration of Plaintiffs' Motion for Alternative Service pursuant to Pa. R.C.P. 430 and Philadelphia Civil Rule 430.1, ~~as it appears to the Court that the above named Defendant, Julio Acevedo is avoiding service of process in the~~ herein matter, it is hereby ORDERED and DECREED that the said Motion is granted.

IT IS FURTHER ORDERED AND DECREED that service of Plaintiffs' Writ of Summons upon Defendant, Julio Acevedo is to be made by Regular United States mail and Certified Mail Return Receipt Requested to the following last known address for Defendant, Julio Acevedo:

406 Lawrie Street
Perth Amboy, New Jersey 08861

BY THE COURT:

Sanders Etal Vs Ryder T-ORDER



17020740900031

ALL F.B.

J. Case ID: 170207409

Control No.: 17072875

Case ID: 170207409

THIS IS A MAJOR JURY MATTER
ASSESSMENT OF DAMAGES REQUIRED

Office of Judicial Records
19 SEP 2017 09:40 am



BENTLEY M. SAUL, LTD.
By: Bentley M. Saul, Esquire
Identification No.: 68832
The Saul Law Building
1313 Race Street
Philadelphia, Pennsylvania 19107
(215) 496-1100

Attorney for Plaintiffs

ANTHONY SANDERS and :
OLIVIA SANDERS, h/w :
v. :
RYDER TRUCK RENTAL, INC a/k/a and :
d/b/a RYDER TRUCK RENTAL :
and :
RYDER SYSTEM, INC. :
and :
JULIO ACEVEDO :

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

FEBRUARY TERM, 2017
NO.: 7409

CIVIL ACTION COMPLAINT
Motor Vehicle Case/Personal Injury

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after the complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Philadelphia Bar Association
Lawyer Referral and Information
One Reading Center
Philadelphia, Pennsylvania
(215) 238-6333

AVISO

Le han demandado a usted on la corte. Si usted quire defenderee de estas demandas expuestas en las peginas siquieries, usted bene vente (2) dias de plazo al pertir de la fecha de la demanda y la notification. Mace faltz assentar uno comperencia escrita o en persona o con un abogado y entregar a la corte en forme escrite sus defendree o sus objectiones a les demandes on contra de su persona. See evisado que ei usted no se defenda, la corte tomare' medides y guade conouer le demando on contra suye sin perrio avise o notification. Adern la corte siedo decider a favor del demandante y require que usted cunola con todas las provisiones de uste demanda. Usted sued porder dinere o sus propiedeedes u oros cerechos importantes pere usted.

LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIATAMENTE. SI NO TIENT ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO. VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DOMOE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

Asociacion De Licenciados De Filadelfia
Servicio De Referencia E Informacion Legal
One Reading Center
Philadelphia, Pennsylvania
Telefono: (215) 238-6333

THIS IS A MAJOR JURY MATTER
ASSESSMENT OF DAMAGES REQUIRED

BENTLEY M. SAUL, LTD.
By: Bentley M. Saul, Esquire
Identification No.: 68832
The Saul Law Building
1313 Race Street
Philadelphia, Pennsylvania 19107
(215) 496-1100

Attorney for Plaintiffs

ANTHONY SANDERS and :
OLIVIA SANDERS, h/w :
v. :
RYDER TRUCK RENTAL, INC a/k/a and :
d/b/a RYDER TRUCK RENTAL :
and :
RYDER SYSTEM, INC. :
and :
JULIO ACEVEDO :

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

FEBRUARY TERM, 2017
NO.: 7409

CIVIL ACTION COMPLAINT
Motor Vehicle Case/Personal Injury

Plaintiff, by counsel, Bentley M. Saul, LTD, hereby demands damages from the Defendants herein, and in support thereof, avers:

1. Plaintiff Anthony Sanders is an adult individual who resides at the address as stated in the original process filed in this matter.
2. Plaintiff Olivia Sanders is an adult individual who resides at the address as stated in the original process filed in this matter.
3. Defendant Ryder Truck Rental, Inc a/k/a and d/b/a Ryder Truck Rental is an organized and existing business entity that may be served with process at the address as stated in the original process filed in this matter.
4. Defendant Ryder System, Inc. is an organized and existing business entity that may be served with process at the address as stated in the original process filed in this matter.
5. Defendant Julio Acevedo is an adult individual who resides at the address as stated in the original process filed in this matter.

COUNT I
PLAINTIFFS V. DEFENDANTS
NEGLIGENCE AND RECKLESSNESS

6. Plaintiffs hereby incorporate paragraphs 1 through 5 above as if they were set forth fully and completely herein.

7. At all times material hereto the entity Defendants acted by and through its/their agents servants workmen and employees including Defendant Julio Acevedo all of whom were acting within the course and scope of his agency and employment with Defendants.

8. At all times material hereto Defendants owned operated occupied maintained managed and controlled a white 2015 Freightliner truck with VIN# 3ALACWDT1FDGD1474 ["Delivery Truck"].

9. On June 24, 2015 at or about 5:02 am Defendant Julio Acevedo was traveling on Northbound 52nd Street at and near and into its intersection with Jefferson Street in Philadelphia and to the left of the Nissan motor vehicle operated by Anthony Sanders also heading in a Northbound direction on Northbound 52nd Street at and near and into its intersection with Jefferson Street in Philadelphia.

10. On the above date and time and when the traffic light for vehicles heading Northbound on 52nd Street turned green at its intersection with Jefferson Street, Defendants' Delivery Truck suddenly violently and without any warning or signal made a right turn causing the front passenger side of the Delivery Truck to slam into the drivers side and rear of Plaintiffs' Nissan motor vehicle.

11. This incident was caused solely by the direct and/or vicarious and joint and/or several negligence and recklessness of the Defendants and was not caused by any act or failure to act on the part of Anthony Sanders who at all times material hereto acted reasonably and lawfully and with all due and appropriate care.

12. There was nothing that Anthony Sanders could do to avoid Defendants' Delivery Truck that suddenly violently and without any warning made a right turn into the vehicle he was operating.

13. The steel metal components on the front end of Defendants' Delivery Truck slammed into the driver's side and rear of Plaintiffs' vehicle with great force.

14. Plaintiffs' vehicle sustained damage to the left side and rear and Defendants' Delivery Truck sustained damage to its front bumper on the passenger side as a direct result of the impact.

15. As a direct and proximate result of the joint and/or several and direct and/or vicarious negligence and recklessness of the Defendants, Anthony Sanders sustained serious bodily injuries and/or exacerbated prior conditions and Mr. Sanders and his wife [lost consortium] may be entitled to recover from Defendants for the following elements of damages according to law:

- (a) L3-3 disc protrusion/herniation per MRI;
- (b) L4-5 disc protrusion/herniation per MRI;
- (c) L5-S1 disc protrusion/herniation per MRI;
- (d) Cervical spine sprain/strain with myofascitis;
- (e) Thoracic spine sprain/strain;
- (f) Lumbar spine sprain/strain with myofascitis;
- (g) Right shoulder pain;
- (h) Post-traumatic headache;
- (i) Myofascial syndrome; and,
- (j) Aggravated degenerative disc disease.
- (k) Past medical expenses incurred for the diagnosis, treatment and care of the said personal injuries;
- (l) Future medical expenses incurred for the diagnosis, treatment and care of the said personal injuries;
- (m) Past lost earnings and earning capacity;
- (n) Future lost earnings and earning capacity;
- (o) Past pain;
- (p) Future pain;
- (q) Past suffering;
- (r) Future suffering;
- (s) Embarrassment and humiliation;
- (t) Past loss of enjoyment of life;
- (u) Future loss of enjoyment of life;
- (v) Disfigurement and scarring (if surgery performed);
- (w) Lost consortium [Olivia Sanders]

- WHEREFORE, Plaintiffs demand damages from the Defendants herein jointly and/or severally and directly and/or vicariously in an amount in excess of the arbitration limits plus interest thereon, costs, and any other sums that this Honorable Court deems appropriate.

16. Plaintiffs hereby incorporate paragraphs 1 through 15 above as if they were set forth fully and completely herein.

17. As a direct and proximate result of the joint and several and direct and vicarious negligence and recklessness of Defendants, Olivia Sanders, as the lawful wife of Anthony Sanders, has been and probably will in the future be deprived of the assistance, aid, society and consortium of her husband, Anthony Sanders, to her great detriment and loss.

WHEREFORE, Plaintiffs demand damages from the Defendants herein jointly and/or severally and directly and/or vicariously in an amount in excess of the arbitration limits plus interest thereon, costs, and any other sums that this Honorable Court deems appropriate.

By: /s/
Bentley M. Saul, Esquire
Attorney for Plaintiff

VERIFICATION

I, Anthony Sanders, verify that the facts set forth in my Civil Action Complaint are true and correct to the best of my knowledge, information and belief. I further acknowledge my understanding that false statements are made subject to the penalties of 18 Pa. C.S.A Section 4904 relating to unsworn falsification to authorities.

Anthony Sanders